



Your business
is our business.

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June 30, 2015

VIA Electronic Comment Filing System

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Thumb Cellular LLC
Study Area Code 319005**

Dear Ms. Dortch:

On behalf of Thumb Cellular LLC, JSI files the attached FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	319005
<015> Study Area Name	Thumb Cellular LLC
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Neal Eichler
<035> Contact Telephone Number: Number of the person identified in data line <030>	9894534391 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	naeic@avci.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
		(check box when complete)	
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<input type="checkbox"/>	<input type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)			
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input type="checkbox"/>	<input type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input type="checkbox"/>	<input type="checkbox"/>
<440> Fixed		<input type="checkbox"/>	<input type="checkbox"/>
<450> Mobile		<input type="checkbox"/>	<input type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">319005mi510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">319005mi610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1000> Voice Services Rate Comparability Certification	Yes <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	(attach descriptive document)	<input type="checkbox"/>	<input type="checkbox"/>
<1100> Certify whether terrestrial backhaul options exist (Yes or No) <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<1110>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting Data Collection Form	
FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Neal Eichler 9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net
<110>	Has your company received its ETC certification from the FCC?	<input type="radio"/> (yes / no) <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/> (yes / no) <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<input type="text"/>
<114>	Report how much universal service (USF) support was received	<input type="text"/>
<115>	How much (USF) was used to improve service quality and how support was used to improve service quality	<input type="text"/>
<116>	How much (USF) was used to improve service coverage and how support was used to improve service coverage	<input type="text"/>
<117>	How much (USF) was used to improve service capacity and how support was used to improve service capacity	<input type="text"/>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<input type="text"/>

**(200) Service Outage Reporting (Voice)
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net

[illegible]

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	naei@avci.net

[illegible]

**(800) Operating Companies
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	Neal Eichler 9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeiC@avci.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers

Lifeline Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website HTTP <http://www.thumbcellular.com/michigan-lifeline/>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010>	Study Area Code	319005
<015>	Study Area Name	THUMB CELLULAR LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	999553391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010>

2nd Year Certification {47 CFR § 54.313(b)(1)i}

<2011a>

3rd Year Certification {47 CFR § 54.313(b)(1)ii}

<2011b>

Attachment {47 CFR § 54.313(b)(1)ii}

Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}

<2012>

2013 Frozen Support Calculation {47 CFR § 54.313(c)(1)}

<2013>

2014 Frozen Support Calculation {47 CFR § 54.313(c)(2)}

<2014>

2015 Frozen Support Calculation {47 CFR § 54.313(c)(3)}

<2015>

2016 and future Frozen Support Calculation {47 CFR § 54.313(c)(4)}

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016>

Certification Support Used to Build Broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017>

3rd year Broadband Service Certification

<2018>

5th year Broadband Service Certification

<2019>

Interim Progress Certification

<2020>

Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

<2021>

Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Biehler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naelc@avci.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)

Progress Report on 5 Year Plan

Milestone Certification (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3011)

Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

(3012)

Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

Name of Attached Document Listing Required Information

(3013)

Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))

(Yes/No)

(3014)

If yes, does your company file the RUS annual report

(Yes/No)

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)

(3016)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3017)

If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

(Yes/No)

(3018)

If the response is no on line 3014, Is your company audited?

(Yes/No)

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

(3020)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3021)

Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

(3023)

Underlying information subjected to a review by an independent certified public accountant

(3024)

Underlying information subjected to an officer certification.

(3025)

Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

(3026)

Attach the worksheet listing required information

Name of Attached Document Listing Required Information

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Bichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naelc@avci.net

Financial Data Summary

- (3027) Revenue
- (3028) Operating Expenses
- (3029) Net Income
- (3030) Telephone Plant In Service(TPIS)
- (3031) Total Assets
- (3032) Total Debt
- (3033) Total Equity
- (3034) Dividends

**Certification - Reporting Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010> Study Area Code	319005
<015> Study Area Name	Thumb Cellular LLC
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035> Contact Telephone Number - Number of person identified in data line <030>	9894534391 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis Inc</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>John Staurulakis Inc</u>
Name of Reporting Carrier:	<u>Thumb Cellular LLC</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>06/29/2015</u>
Printed name of Authorized Officer:	<u>Neal Eichler</u>
Title or position of Authorized Officer:	<u>Vice President</u>
Telephone number of Authorized Officer:	<u>9894534391 ext.</u>
Study Area Code of Reporting Carrier:	<u>319005</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>Thumb Cellular LLC</u>
Name of Authorized Agent or Employee of Agent:	<u>JSI</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>06/29/2015</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Cassandra Heyne</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Consultant</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>3014597590 ext.</u>
Study Area Code of Reporting Carrier:	<u>319005</u> Filing Due Date for this form: <u>07/01/2015</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Thumb Cellular, LLC's Demonstration of Complying with Applicable Service Quality

Standards and Consumer Protection Rules for Voice Services:

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

As a cellular provider, the Thumb Cellular, LLC (“Company”) is concerned about customer privacy and safety issues. The Company certifies that it has and will continue to comply with all applicable consumer protection laws and rules and all applicable service quality laws and rules. This document details the processes and procedures that the Company follows to ensure compliance.

The Company provides 2-way commercial mobile radio services (CMRS), or wireless service, to customers in Michigan’s “Thumb” area (in the eastern part of the Lower Peninsula in Huron, Tuscola, and Sanilac Counties). Caro, Bad Axe, Vassar, Sandusky, Cass City, and Croswell are the largest cities in those counties. The Company holds an FCC license for the

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

B-side wireline cellular service market designated as Michigan Rural Service Area (RSA) 10.

The Company's network consists of 48 cell sites with 134 sectors and a Nortel DMS-100 switch, through which it provides coverage to virtually all of the population located in RSA 10. The Company provides wireless telecommunications services to approximately 35,000 customers in its service area. It provides service as an ETC in the following exchanges within its FCC-authorized licensed area:

<u>Wire Center</u>	<u>CLLI Code</u>	<u>Study Area No.</u>
Pigeon Telephone	PGNIM IXJDS0	310721
Wolverine Telephone		
Fostoria	FSTRMIXIRS1	310738
Millington	MGTNMIXIDS1	310738
Century Telephone		
Marlette	MRLTMIXIDS0	310702
Caro	CAROMIXIDS1	310702
Port Hope	PTHPMIXIDS0	310702
Port Austin	PTASMIXIDS0	310702

As a wireless carrier in Michigan, the Company has operated for many years in the telecommunications industry, an industry that has had varying degrees of regulation over time. The Company's long-time operations in this industry have made it well aware of all applicable standards and rules, including those pertaining to service quality standards and consumer protection. The Company routinely reviews and stays abreast of changes in standards and rules, including those pertaining to service quality standards and consumer protection, among other ways, by (1) regularly conferring with and contacting consultants and attorneys who regularly monitor changes in federal and state law and who provide alerts and updates to the Company; and (2) continuing its membership in the Competitive Carriers

Association – a national telecommunications industry association that monitors changes in the law and provides information to its members.

Thumb Cellular, LLC (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with the Cellular Telecommunications Industry Association Consumer Code for Wireless Service (“CTIA Code”) as explained below, and does business as Thumb Cellular.

Thumb Cellular, LLC, adheres to 11 points within the CTIA Consumer Code, including disclosing rates, additional taxes, fees, surcharges and terms of service; providing coverage maps; making customer service readily accessible; and allowing a 14-day trial period for new service.

1. THUMB CELLULAR, LLC, DISCLOSES RATES AND TERMS OF SERVICE TO CONSUMERS

For each service plan offered to new consumers, Thumb Cellular, LLC, discloses to consumers at point of sale and on its web sites, at least the following information, as applicable: (a) the coverage area for service; (b) any activation or initiation fee; (c) the monthly access fee or base charges; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer’s wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (l) the amount and nature of any early termination fee that may apply; and (m) the trial period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

2. THUMB CELLULAR, LLC, MAKES AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE

Thumb Cellular, LLC, makes available at point of sale and on its web sites maps depicting approximate domestic coverage applicable to each of their

service plans currently offered to consumers. To enable consumers to make comparisons among carriers, Thumb Cellular, LLC, generated the maps using generally accepted methodologies and standards to depict outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. Thumb Cellular, LLC, periodically updates such maps as necessary to keep them reasonable current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, Thumb Cellular, LLC, incorporates coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

3. THUMB CELLULAR, LLC, PROVIDES CONTRACT TERMS TO CUSTOMERS AND CONFIRMS CHANGES IN SERVICE

When a customer initiates new service or a change in existing service, Thumb Cellular, LLC, provides or confirms any new material terms and conditions of the ongoing service with the customer.

4. THUMB CELLULAR, LLC, ALLOWS A TRIAL PERIOD FOR NEW SERVICE

When a customer initiates postpaid service with Thumb Cellular, LLC, the customer will be informed of and given a period of not less than 14 days to try out the service. Thumb Cellular, LLC, does not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

5. THUMB CELLULAR, LLC, PROVIDES SPECIFIC DISCLOSURES IN ADVERTISING

In advertising of prices for wireless service plans or devices, Thumb Cellular, LLC, discloses material charges and conditions related to the advertised prices and services, including if applicable and to the extent the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free"; (l) for any service plan advertised as "nationwide", (or using similar terms), the carrier will have available substantiation for this claim; and (m) whether prices or benefits apply only for

a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

6. THUMB CELLULAR, LLC, SEPARATELY IDENTIFIES CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS

On customers' bills, Thumb Cellular, LLC, distinguishes (a) monthly charges for service and features, and other charges collected and retained by Thumb Cellular, LLC, from (b) taxes, fees and other charges collected by Thumb Cellular, LLC, and remitted to federal, state, or local governments. Thumb Cellular, LLC, will not label cost recovery fees or charges as taxes.

7. THUMB CELLULAR, LLC, PROVIDES CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS

Thumb Cellular, LLC, will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable advance notice of a proposed modification and allowing those customer a time period of not less than 14 days to cancel their contracts with no early termination fee.

8. THUMB CELLULAR, LLC, PROVIDES READY ACCESS TO CUSTOMER SERVICE

Customers will be provided a toll-free telephone number to access Thumb Cellular, LLC's, customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. Thumb Cellular, LLC, provides information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information is included, at a minimum, on all billing statements, in written responses to customer inquiries and on Thumb Cellular, LLC, web sites. Thumb Cellular, LLC, also makes such contact information available, upon request, to any customer calling customer service departments.

9. THUMB CELLULAR, LLC, PROMPTLY RESPONDS TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES

Thumb Cellular, LLC, responds in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

10. THUMB CELLULAR, LLC, ABIDES BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY

Thumb Cellular, LLC, abides by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and makes available to the public its privacy policy concerning information collected online. Thumb Cellular, LLC, abides by the CTIA Best Practices and Guidelines or Location-Based Services.

11. THUMB CELLULAR, LLC, PROVIDES CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND MESSAGING USAGE, AND INTERNATIONAL ROAMING

Thumb Cellular, LLC, provides, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited

data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. Thumb Cellular, LLC, generates the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. Thumb Cellular, LLC, clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

In addition to the aforementioned CTIA compliance, Thumb Cellular, LLC, as a licensed wireless carrier in the state of Michigan, is subject to consumer protection obligations to the extent applicable to wireless carriers under the rules of the Michigan Public Service Commission (MPSC) and state law. These obligations include, but are not limited to, the following: (1) compliance with the Michigan Consumer Protection Act sections 445 and 484; (2) compliance with Anti-Slamming procedures and related rules that the MPSC adopted in MPSC Case U-11757 and Case U-11900; and (3) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

Moreover, as a licensed wireless carrier in Michigan, the Company is subject to the Michigan Telecommunications Act (MTA), MCL 484.2101 *et seq.* (to the extent it covers wireless carriers) and the Michigan Public Service Commission's (MPSC) jurisdiction (to the same extent). And insofar as it applies to wireless service, the Company must also comply with the applicable rules the MPSC adopts under the MTA, the federal Communications Act (FTA), and rules the FCC adopts under the FTA. And as a Michigan business, the Company must comply with generally applicable state consumer protection laws.

Some obligations imposed by state and federal law relate to both service quality and consumer protection. And there are also some obligations state or federal law imposes that are specifically for consumer protection. These obligations include the following:

- (1) complying with Michigan's consumer protection law, MCL 445.901 *et seq.*;
- (2) to the extent relevant to wireless carriers, complying with the MTA's consumer-oriented conduct requirements set forth in MCL 484.2502, which prohibits, among other things, false, deceptive, and misleading statements; charging a customer for a service the customer did not order; charging a customer for service after the customer has cancelled service; causing a probability of confusion or misunderstanding as to a customer's legal rights; misleading representations regarding the delivery of service; and certain disconnections;
- (3) to the extent relevant to wireless carriers, complying with Michigan Anti-Slamming Procedures, including those in the MTA, MCL 484.2305, and related rules the M PSC adopted, such as those adopted in Orders in M PSC Case Nos. U-11757 and U-11900;
- (4) to the extent relevant to wireless carriers, complying with the state and federal requirements regarding truth-in-billing, E 9-1-1 service, and basic local exchange service per Section 2305b(c) of the MTA, MCL 484.2305b(c);
- (5) complying with the MTA's duties applicable to all telecommunication providers, including providing a customer upon request with a simple

explanation of the terms of service, which includes a statement of all fees and charges that will be included on the customer's monthly bill, per MCL 464.2305b(a); and

- (6) to the extent relevant to wireless carriers, complying with state and federal requirements relating to protecting customers' privacy, including state and federal requirements as to confidential proprietary network information (CPNI) and identity theft.

The Company has consistently complied with all of the above obligations imposed by state and federal law related to service quality and consumer protection by, among other things, the following:

- it complies with all applicable state and federal consumer protection and service quality standards (including any that the MPSC and FCC adopted);
- it complies with Michigan consumer protection requirements in Michigan's consumer protection law, MCL 445.901 *et seq*;
- it has trained its customer service representatives to explain to customers rates, charges, and terms of service, available programs, customers' rights, and to furnish customers with reasonable access to information and assistance and the like;
- it has trained its customer service representatives to interact with customers respectfully and in accordance with consumer protections;
- it maintains a business office adequately staffed with qualified persons to assist customers and notify customers of their rights;
- to the extent applicable to wireless carriers, it complies with applicable state and federal requirements regarding truth-in-billing, E 9-1-1 service, and basic local exchange service per Section 2305b(c) of the MTA, MCL 484.2305b(c) and those identified in the MPSC's Orders in Case No. U-11043 (regarding billing standards);
- it has adopted a CPNI compliance manual consistent with all applicable laws;

- it certified to the FCC in February 2014 that it complies with the FCC’s CPNI rules;
- it sends – at least annually and often twice a year – its customers an opt-out bill message regarding its privacy policy. (In 2014, it sent the notice that printed with its 5/16/14 and 6/1/14 invoices and did also send notices for Dial 611 with its 5/16/14 and 6/1/14 invoices and will do the same for the National Do Not Call Registry with its 7/1/14 and 7/16/14 invoices);
- it regularly notifies its customers regarding the * 67 feature and similar functions;
- it regularly notifies its customers of the Do-Not-Call list and how to participate;
- it has adopted an Identity Theft Prevention Program and Policy consistent with all applicable “Red Flag” rules;
- it passes through to its customers all state and federal Lifeline and Link-up discounts, and notifies its customers of the Lifeline and Link-up programs and how to apply if eligible;
- it complies with Michigan Anti-Slamming Procedures, including those in the MTA and related rules the MPSC adopted, such as those adopted in Orders in MPSC Case Nos. U-11757 and U-11900; and
- it complies with state and federal requirements relating to protecting customers’ privacy, including state and federal requirements as to confidential proprietary network information (CPNI) and identity theft.

Thumb Cellular, LLC's demonstration of ability to function in emergency situations for voice services:

Thumb Cellular, LLC ("Company") hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the Michigan Telecommunications Act (MTA). The Company's network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company has battery backup at all office locations and in its electronic equipment sites in accordance with the specifications identified in Section 305c(a) of the MTA, 484.2305c.

The Company has a central office in Pigeon, Michigan. Its central office is equipped with permanent battery back-up power – with battery packs bolted to the floor. That central office's battery packs provide up to about 12 hours of battery back-up functionality. It also has a standby generator in place in its central office. The company also has a large portable generator that can also be used to provide functionality. Those generators, coupled with the permanent battery back-up, enable the Company's central office to keep running for up to about at least 12 hours on pure battery-

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to "demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations."

back-up power, and indefinitely until either power is restored on generator power (so long as fuel is available for the generators) or system changes are made to re-route traffic.

Therefore, as to the requirement in 47 CFR 54.202(a)(2), it has at least 12 hours of back-up battery power that allow it to function in an emergency situation without an external power source. The Company's permanent and portable generators at its central office also allow it to provide power if there is no external power source for an unlimited amount of time (as long as fuel was available).

In addition, the Company has implemented industry practices to re-route traffic around damaged facilities and to manage traffic spikes resulting from emergency situations. It can re-route traffic around damaged facilities by electrical redundancy for all routes that come to the Company's central office. Electrical redundancy means that if the Company had problems with one fiber, it could shift the traffic from that one fiber to another fiber in the same sheath since a fiber sheath has several fiber strands within it.

Further, it can manage traffic spikes resulting from an emergency situation by having back-up power ready and available and having toll electrical redundancy, meaning that all of the Company's facilities are able to keep traffic moving and connecting to manage any traffic spikes that may arise from emergency situations. The Company can also change call routing translations as needed to re-route traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

As the above demonstrates, the Company can re-route originating traffic to alternate transport carriers with interconnecting facilities are out of service. This allows all of the Company's facilities to keep traffic moving and connecting to manage any traffic spikes that may arise from emergency situations. The Company can also change call routing translations as needed to re-route traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require. Its network is engineered to provide

maximum capacity to handle excess traffic in the event of traffic spikes resulting from emergency situations.

The Company also meets the requirements in MCL 484.2305c. As explained above, it has equipped its central office, remote switch, and remote line unit, and interexchange toll switching office or access tandem far above the minimum hours of peak load battery reserve. It also has a permanent generator at its central office, along with a portable generator that may be used to connect its central offices, remote switches, and remote line units within 8 hours.²

² The Company has reasonable amounts of back-up power to provide functionality without an external power source in the form of battery back-up power at each cell site, which enables it to provide service for a minimum of 4-6 hours. It has back-up portable power generators that can be deployed in emergency situations.

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<010>	Study Area Code	319005
<015>	Study Area Name	Thumb Cellular LLC
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Neal Eichler
<035>	Contact Telephone Number - Number of person identified in data line <030>	9894534330 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	naeic@avci.net
<810>	Reporting Carrier	Thumb Cellular, LLC
<811>	Holding Company	Agri-Valley Communications, Inc.
<812>	Operating Company	Thumb Cellular, LLC

[illegible]